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8
9 **UNITED STATES DISTRICT COURT**
10
11 **DISTRICT OF NEVADA**
12

13 UNITED STATES OF AMERICA,) CASE NO: 2:19-cr-300-03-JCM-EJY
14)
15)

16 Plaintiff,

17 vs.

18 **STIPULATION TO CONTINUE**
19 **SENTENCING**
20

21 EDGAR VELASO SAMSON)
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23)
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26)
27)
28)

Defendant.

IT IS HEREBY STIPULATED AND AGREED by and between defendant, EDGAR VELASO SAMSON, by and through his counsel, John Million Turco, Esq., and the United States America, by its counsel, Simon F. Kung, Esq., Assistant United States Attorney, that the above-captioned matter currently scheduled for sentencing on January 13, 2021 at 10:00 a.m. be vacated and continued for sixty days or for a time suitable to the court.

This Stipulation is entered into for the following reasons:

1. The parties agree to a continuance;
2. Defendant is currently out of custody;
3. Counsel for Defendant needs additional time to adequately prepare for sentencing;
4. Counsel for the Defendant has spoken to the Defendant and the Defendant has no objection to this continuance.

1 5. Additionally, denial of this request for continuance could result in a miscarriage
2 of justice.

3 6. For all the above- stated reasons, the ends of justice would best be served by a
4 continuance of the sentencing date by sixty days.
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6 7. This is the first request to continue the sentencing date filed herein.

7 DATED this 8th day of January, 2021
8

9 John Million Turco

10 /s/_____
11 JOHN MILLION TURCO, ESQ.
12 Attorney for Defendant

 Simon F. Kung

10 /s/_____
11 SIMON F. KUNG, ESQ.
12 Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA
3

4 UNITED STATES OF AMERICA,) CASE NO: 2:19-cr-300-03-JCM-EJY
5)
6 Plaintiff,)
7 vs.) **FINDINGS OF FACT, CONCLUSIONS OF**
8) **LAW, AND ORDER**
9)
10 EDGAR VELASO SAMSON)
11)
12 Defendant.)
13 _____)

12 **FINDINGS OF FACT**

13 Based on the stipulation of counsel, and good cause appearing, the Court finds that:

- 14 1. The parties agree to a continuance;
15 2. Defendant is currently out of custody;
16 3. Counsel for Defendant needs additional time to adequately prepare for sentencing;
17 4. Counsel for the Defendant has spoken to the Defendant and the Defendant has no objection to
18 this continuance.
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20 **CONCLUSIONS OF LAW**

- 21 1. Denial of this request would result in a miscarriage of justice;
22 2. For all the above-stated reason, the ends of justice would best be served by a continuance of
23 the sentencing date for sixty days.
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1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA
3

4 UNITED STATES OF AMERICA,) CASE NO: 2:19-cr-300-03-JCM-EJY
5)
6 Plaintiff,)
7 vs.)
8) **ORDER**
9 EDGAR VELASO SAMSON)
10)
11 Defendant.)
12 _____)

13 Accordingly, IT IS SO ORDERED that the sentencing currently scheduled for January
14 13, 2021 at the hour of 10:00 a.m., be vacated and continued to March 24, 2021, at
15 the hour of 10:30 a.m.

16 DATED January 11, 2021.

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18 UNITED STATES DISTRICT JUDGE
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